

United States District Court
Southern District of Texas
FILED

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

AUG 27 2018

UNITED STATES OF AMERICA
V.David J. Bradley, Clerk
CRIMINAL COMPLAINT

Angela Marie Claudio

YOB: 1993

Principal

United States

Case Number:

M-18-1778 -M

Jennifer Jane Snider

YOB: 1984

Co-Principal

United States

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 26, 2018 in Hidalgo, Texas County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Jose Erick Pedraza-Gomez and Luis Antonio Martinez-Petro, both citizens of Mexico, for a total of two (2), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location in La Joya, Texas to the point of arrest in Peñitas, Texas.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On August 26, 2018, camera operators observed two suspected undocumented aliens running north from the brush and crossing Military Highway onto Gonzalez Ave. in La Joya, Texas. This area is commonly used to pick up undocumented aliens due to the close proximity to the Rio Grande River.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

approved by
08/27/18 [Signature]

Sworn to before me and subscribed in my presence,

August 27, 2018
Date

6:55pm

at

McAllen, Texas
City and State

Peter E. Ormsby, U. S. Magistrate Judge
Name and Title of Judicial Officer

[Signature]
Signature of Complainant

Cipriano Shears Senior Patrol Agent
Printed Name of Complainant

[Signature]
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18-1778-M

**RE: Angela Marie Claudio
Jennifer Jane Snider**

CONTINUATION:

A short time later, camera operators observed a black Saturn vehicle driving away from the same area in which the two subjects were observed. At this time, camera operators relayed this information to mobile agents for assistance. Shortly thereafter, with the help of the camera operators, a mobile agent encountered the Saturn as it traveled on Highway 83.

At this time, the mobile agent activated his emergency equipment to conduct a vehicle stop. Agents approached the vehicle and conducted an immigration inspection on the occupants. The driver was identified as Angela Marie Claudio, a United States Citizen and the front seat passenger was identified as Jennifer Jane Snider, a United States Citizen. Two additional passengers sitting in the back were identified as Jose Erick Pedraza-Gomez and Luis Antonio Martinez-Petro, both citizen of Mexico.

All subjects were placed under arrest and transported to the McAllen Border Patrol Station to be processed accordingly.

PRINCIPAL STATEMENT:

Angela Marie Claudio was read her Miranda Rights. She understood and agreed to provide a sworn statement.

Claudio claims her friend Jennifer asked her to give her a ride to meet a boyfriend near Gonzalez Avenue in La Joya, Texas. Claudio stated that Jennifer was going to give her gas money for the ride. When they got there, Claudio claims that the boyfriend did not show up but she saw two people run and board her car. At this point, Jennifer told her that they were going to give them a ride to the Best Western Hotel.

CO-PRINCIPAL STATEMENT:

Jennifer Jane Snider was read her Miranda Rights. She understood and agreed to provide a sworn statement.

Snider stated a person from on an online forum offered her a way to make extra money by picking up a person and transporting him to a Foy's Supermarket. Snider claims she was instructed to go to Gonzalez and Military. Snider stated she was instructed to wait near the road, overlooking the brush, until the people came out of the brush. Snider claims she thinks she was going to receive approximately \$1,000 for transporting the two subjects. Snider stated she was going to split the money with her friend Angela.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18-1778 -M

**RE: Angela Marie Claudio
Jennifer Jane Snider**

CONTINUATION:

MATERIAL WITNESSES STATEMENTS:

Jose Erick Pedraza-Gomez and Luis Antonio Martinez-Petro were read their Miranda Rights. Both understood and agreed to provide a sworn statement.

Pedraza, a citizen of Mexico, stated his father made the smuggling arrangements and paid \$1,400 USD upfront. After crossing the river along with one other person, Pedraza claims they were given instructions to walk through the brush until arriving to a road. Pedraza stated they were to wait for a black car. When the car arrived, Pedraza stated they entered the vehicle and they was given a bottle of water and a juice.

Pedraza identified Claudio, through a photo lineup, as one of the female occupants of the vehicle.

Pedraza identified Snider, through a photo lineup, as one the female occupants of the vehicle.

Martinez, a citizen of Mexico, stated he made the smuggling arrangements and paid \$1,500 USD. After crossing the river with two others, Martinez claims the guide led them to the pickup location. Martinez claims the guide was on the phone and claims they waited for approximately 10 minutes until a vehicle arrived. When the vehicle arrived, the guide instructed them to board it.

Martinez identified Claudio, through a photo lineup, as the driver of the vehicle.

Martinez identified Snider, through a photo lineup, as the front seat passenger.